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18 NATIONAL BOARD OF MEDICAL EXAMINERS,

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27 Attorneys for Plaintiff

28 CORNELL WELLS, JR.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CORNELL WELLS, JR.,

Plaintiff,

v.

NATIONAL BOARD OF MEDICAL
EXAMINERS, a not-for-profit corporation,
FEDERATION OF STATE MEDICAL
BOARDS, INC., a not-for-profit corporation,

Defendants.

Case No. 3:21-cv-01279-JSC

**JOINT REPORT ON DEPOSITION
SCHEDULING**

Pursuant to the Court's July 13, 2022 Order Following July 13, 2022 Case Management Conference, the parties have identified the following deposition dates:

Dr. George Litchford - August 19, 2022

Dr. Kevin Murphy - August 31, 2022

Dr. Cornell Wells - September 1, 2022

Dr. Annette Swain - August 24, 2022

NBME offered plaintiff three dates for Dr. McGeehan's deposition, but those dates did not work for plaintiff. The parties will continue to work to finalize a date for Dr. McGeehan's deposition.

Regarding deposition scheduling, plaintiff's counsel set aside nine dates of availability to facilitate scheduling all of the depositions: August 17, 18, 19, 24, 25, 26, 31, September 1, and September 2. Unfortunately, counsel could not agree on a date for Dr. McGeehan. None of the dates worked for scheduling Dr. McGeehan's deposition.

Plaintiff also intends to take the deposition of Catherine Farmer, Psy.D., who was the Director of Disability Services for NBME. Plaintiff's counsel understands through meet and confer with counsel for NBME that Ms. Farmer is no longer employed by NBME. Defendants' Initial Disclosures dated May 3, 2021 indicated that Dr. Farmer could be contacted through counsel. However, defense counsel has subsequently provided last known contact information for Ms. Farmer so that plaintiff's counsel can issue a subpoena directly to Dr. Farmer. Plaintiff's counsel will issue a subpoena forthwith and continue to work with defense counsel to schedule all remaining depositions.

DATED: July 20, 2022

PERKINS COIE LLP

By /s/ Caroline M. Mew
Caroline M. Mew

Attorneys for Defendants
NATIONAL BOARD OF MEDICAL
EXAMINERS, and FEDERATION OF
STATE MEDICAL BOARDS, INC.

1 DATED: July 20, 2022

YOUNG LAW GROUP

2
3 By /s/ Eric G. Young
Eric G. Young

4 Attorneys for Plaintiff
5 CORNELL WELLS, JR.
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Joint Report on Deposition Scheduling on the following:

Eric G. Young
YOUNG LAW GROUP
411 Russell Avenue, Second Floor
Santa Rosa, California 95403

To be sent by the following indicated method or methods, on the date set forth below:

☒ by **sending via the court's electronic filing system**
☐ by **email**
☐ by **mail**
☐ by **hand delivery**

DATED: July 20, 2022

PERKINS COIE LLP

By: /s/Caroline M. Mew

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CERTIFICATE OF SERVICE***Wells Jr. v. National Board of Medical Examiners, et al.*****USDC-ND, Oakland Division, Case No. 3:21-cv-01279-JSC**

At the time of service, I was over 18 years of age and not a party to this action. My business address is 411 Russell Avenue, Santa Rosa, CA 95403. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On July 21, 2022, I served the following identified document(s):

JOINT REPORT ON DEPOSITION SCHEDULING

I served the document(s) on all interested parties as follows:

Name of Party/Counsel Served:Attorney For:

Aaron J. Ver
 Caroline Mew
 Robert Burgoyne
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 505 Howard Street, Ste. 1000
 San Francisco, CA 94105
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AVer@perkinscoie.com
CMew@perkinscoie.com
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Attorneys for National Board of Medical
 Examiners, and Federation of State
 Medical Boards, Inc.

I served the above-named documents as follows:

BY FACSIMILE TRANSMISSION - pursuant to agreement of the parties, from fax number (707) 289-8059 to the fax number(s) set forth above. The facsimile machine I used complied with Rule 2.301(3) and no error was reported by the machine. Pursuant to Rule 2.306(h)(4), I caused the machine to print a transmission record, a copy of which is attached.

BY MAIL -

By personally depositing the documents in a sealed envelope addressed as set forth above with the U.S. Postal Service, postage fully prepaid, sent by regular mail and certified mail, return receipt requested

X By placing documents enclosed in a sealed envelope addressed as set forth above for collection and mailing. I am readily familiar with my firm's practice of collection and processing correspondence for mailing. In the ordinary course of my firm's business, correspondence is deposited with U.S. postal service on the same day it is placed for collection, postage fully prepaid.

BY PERSONAL SERVICE - by delivering a copy of the document(s) by hand to the addressee.

BY EXPRESS SERVICE - by depositing in a box or other facility regularly maintained by the

